



STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION

2500 Mt. Moriah, Suite E-645
Memphis, Tennessee 38115-1511

April 27, 1992

Ms. Beth Brown
Remedial Project Manager
North Site Management Section
United States Environmental Protection Agency
345 Courtland St., NE
Atlanta, Georgia 30365

Re: Carrier, Collierville Site, TDSF # 79-552

Dear Ms. Brown:

Enclosed are comments for the Carrier Site Feasibility Study dated March 31, 1992 and received in this office on 4/07/92.

I am aware that many of the details of the alternative selected will be worked out during the design phase, including the potential metals problem and the number of extraction wells required.

As always if you have any questions or comments please feel free to call at (901) 543-6695.

Sincerely,

Wm Jordan English
Manager, Memphis Field Office
Tennessee Division of Superfund

Enclosure

cc: DSF, NCO file
DSF, MFO file



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CARRIER SITE
Collierville, Shelby County, Tennessee
FEASIBILITY STUDY COMMENTS
Draft Dated 3/31/92
TDSF Site # 79-552

Page 1-21, Table 1-6--Although the origin of the lead contamination is uncertain it may nevertheless have to be considered a contaminant of concern.

Page 1-22, Sec. 1.4.3--For completeness, the lead levels and their HI should be further elaborated on, both with regard to its origin and remedial objectives.

Page 2-6, Sec. 2.2.1--See the first comment.

Page 2-40, Treatment Actions--Off-gas treatment would also comply with EPA's preference for permanent solutions.

Page 2-46, UV/Photolysis--This process truly destroys the contaminant whereas simple air stripping simply swaps media.

Page 2-47-50, Table 2-10--The assignment of qualifying adjectives with regard to cost appears to be arbitrary and possibly incorrect in some places. For example, air stripping is called low cost while UV/Peroxidation is called moderate cost. From review of the information provided the UV/Peroxidation would only increase the cost by about 7%. Low, moderate, and high need to be qualitatively defined obviously. At the beginning of the table in the cost category for access restrictions of institutional actions the O&M cost for groundwater treatment is considered moderate, but in the same category for volatilization (stripping) of the treatment response action cost is classified as low. For this table to mean anything the general response actions need to be comparable.

Page 2-51, Alternative Water Supply--How much less cost effective? This alternative possibly should be retained as a contingency alternative.

Page 2-53, RCRA Cap--I strongly disagree that a RCRA cap is "certainly sufficient" to prevent downward migration of DNAPL (vadose) into the water table and eventually the Memphis Sands.